

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Swiss Caps  
2300 Highway 250  
Patriot, Indiana 47038**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

|   |  |
|---|--|
| Operation Permit No.: T 155-10975-00005   |  |
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date: April 18, 2001<br><br>Expiration Date: April 18, 2006 |

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]  
[326 IAC 2-7-6(6)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1)and(6)]  
[326 IAC 1-6-3]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12(b)(2)]
- B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]
- B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]
- B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]
- B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

### C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less  
Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

**Testing Requirements [326 IAC 2-7-6(1)]**

C.9 Performance Testing [326 IAC 3-6]

**Compliance Requirements [326 IAC 2-1.1-11]**

C.10 Compliance Requirements [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]  
[326 IAC 2-7-6]

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6] [326 IAC 2-7-19(e)]

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS: Resin and Gel Coat Application Booths**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

D.1.4 Volatile Organic HAPs

D.1.5 Volatile Organic HAPs Emissions

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.6 Particulate Matter (PM)

D.1.7 Monitoring

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.8 Record Keeping Requirements

D.1.9 Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS: Cutting and Grinding Operations**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

**Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

- D.2.2 Particulate Matter (PM)
- D.2.3 Compliance Schedule

**D.3 FACILITY OPERATION CONDITIONS: Surface Coating**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]
- D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

- D.3.4 Volatile Organic Compounds (VOC)
- D.3.5 VOC Emissions

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.3.6 Particulate Matter (PM)
- D.3.7 Monitoring

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.3.8 Record Keeping Requirements
- D.3.9 Reporting Requirements

**D.4 FACILITY OPERATION CONDITIONS: Insignificant Activities - Resin Storage Tank**

**General Construction Conditions**

- D.4.1 General Construction Conditions
- D.4.2 Effective Date of the Permit

**D.5 FACILITY OPERATION CONDITIONS: Insignificant Activities**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

**Certification**

**Emergency Occurrence Report**

**Quarterly Reports (2)**

**Quarterly Deviation and Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass truck cap and vehicle accessory manufacturing source.

|                         |  |
|-------------------------|--|
| Responsible Official:   | Anthony L. Gregory   |
| Source Address:         | 2300 Highway 250, Patriot, Indiana, 47038  |
| Mailing Address:        | 2300 Highway 250, Patriot, Indiana, 47038  |
| SIC Code:               | 3799   |
| County Location:        | Switzerland  |
| Source Location Status: | Attainment for all criteria pollutants   |
| Source Status:          | Part 70 Permit Program<br>Minor Source, under PSD Rules;<br>Major Source, Section 112 of the Clean Air Act |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary fiberglass truck cap and vehicle accessory manufacturing source consists of the following emission units and pollution control devices:

- (a) Two (2) polyester resin application booths, known as EU01 and EU02, constructed in 1988, exhausted through stacks 01 and 02, respectively, equipped with one (1) air-assisted airless spray gun, each, and dry filters for particulate matter control, capacity: 8.0 fiberglass truck caps per hour, total.
- (b) One (1) gel coat application booth, known as EU03, constructed in 1988, exhausted through stack 03, equipped with one (1) air-assisted airless spray gun and dry filters for particulate matter control, capacity: 8.0 fiberglass truck caps per hour.
- (c) Cutting and grinding operations, known as EU04, constructed in 1988, to be equipped with a vacuum system connected to a baghouse, exhausted into the general building ventilation, capacity: 5.0 fiberglass truck caps per hour.
- (d) One (1) paint spray booth, known as EU05, constructed in 1990, exhausted through stack 05, equipped with one (1) HVLP spray gun, dry filters for particulate matter control, and a 1.9 million British thermal unit per hour propane-fired air makeup heater, capacity: 12.0 fiberglass truck caps per hour.
- (e) One (1) curing booth, known as EU06, constructed in 1990, exhausted through stack 06, capacity: 12.0 fiberglass truck caps per hour.
- (f) One (1) clear coat spray booth, known as EU07, constructed in 1999, exhausted through stack 07, equipped with one (1) HVLP spray gun, dry filters for particulate matter control, and a 1.5 million British thermal unit per hour propane-fired air makeup heater, capacity: 12.0 fiberglass truck caps per hour.

- (g) One (1) curing booth, known as EU08, equipped with two (2) 1.5 million British thermal unit per hour propane-fired air makeup heaters, constructed in 1999, exhausted through stacks 08 and 09, capacity: 8.0 fiberglass truck caps per hour.
- (h) One (1) bulk resin storage tank, known as EU11, to be constructed, capacity: 5,800 gallons of polyester resin.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary fiberglass truck cap and vehicle accessory manufacturing source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (c) One (1) touch-up paint area in the aluminum caps shop, VOC emissions less than fifteen (15) pounds per day.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary or source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION B**

**GENERAL CONDITIONS**

**B.1** Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

**B.2** Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

**B.3** Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

**B.4** Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.5** Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.6** Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

**B.7** Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

---

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and



United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)]  
[326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
  - (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
  - (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.
- B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

---

  - (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
  - (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
  - (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

---

  - (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
  - (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided

for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and



- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

|               |
|---------------|
| Entire Source |
|---------------|

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 **Opacity [326 IAC 5-1]**  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**  
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 **Stack Height [326 IAC 1-7]**  
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP)

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement



shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

- (1) Indicate estimated actual emissions of criteria pollutants from the source;
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) Two (2) polyester resin application booths, known as EU01 and EU02, constructed in 1988, exhausted through stacks 01 and 02, respectively, equipped with one (1) air-assisted airless spray gun, each, and dry filters for particulate matter control, capacity: 8.0 fiberglass truck caps per hour, total.
- (b) One (1) gel coat application booth, known as EU03, constructed in 1988, exhausted through stack 03, equipped with one (1) air-assisted airless spray gun and dry filters for particulate matter control, capacity: 8.0 fiberglass truck caps per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to the determination of Best Available Control Technology for VOC emissions from the two (2) polyester resin application booths and one (1) gel coat application booth, the Permittee shall comply with the following conditions:

- (a) Use of gel coats and resins that contain styrene shall be limited such that the potential to emit (PTE) VOCs for the two (2) polyester resin application booths and one (1) gel coat application booth shall be less than one hundred fifty-two (152) tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
  - (1) VOC emissions from the application of gel coats and resins shall be calculated as volatile organic HAP emissions. Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
  - (2) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Associations, April 20, 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (b) The total monomer contents of all resins and gel coats used shall be limited to thirty-five percent (35%) by weight for resins, thirty-seven percent (37%) by weight for gel coats or their equivalent on an emissions mass basis.

- (1) HAP monomer contents shall be calculated on a neat basis, which means excluding any filler.
- (2) Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.
- (3) The use of resins with HAP monomer contents lower than 35%, gel coats with HAP monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with HAP monomer contents higher than 35%, and/or gel coats with HAP monomer contents higher than 37%. This is allowed to meet the HAP monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat)  $\div$  (Emissions from 35% resin or 37% gel coat) - (Emissions from >35% resin, >37% gel coat, and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \*  
EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray mechanical applications of a design and specifications approved by IDEM, OAM.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

- (d) Optimized spray techniques according to a manner approved by IDEM, OAM shall be used for gel coats and filled resins at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) A one (1) quart, air-atomized spray gun may be used as needed for touch-up purposes only.
- (f) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) For VOC- and/or HAP-containing materials:
  - (A) Cleanup solvent containers shall be used to transport solvent from drums to work.
  - (B) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.
  - (C) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (D) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
  - (E) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (F) Storage containers shall be kept covered when not in use.

**D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, the PM from the two (2) polyester resin application booths and one (1) gel coat application booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

**D.1.4 Volatile Organic HAPs**

Compliance with the volatile organic HAP content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.1.5 Volatile Organic HAPs Emissions**

Compliance with Condition D.1.1 shall be demonstrated within thirty (30) days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.6 Particulate Matter (PM)**

In order to comply with Condition D.1.2, the dry filters for PM control shall be in operation at all times when any of the two (2) polyester resin application booths or one (1) gel coat application booth are in operation.

**D.1.7 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) polyester resin application booths and one (1) gel coat application booth stacks 01, 02, and 03 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.8 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (c) Cutting and grinding operations, known as EU04, constructed in 1988, to be equipped with a vacuum system connected to a baghouse, exhausted into the general building ventilation, capacity: 5.0 fiberglass truck caps per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter emission rate from the cutting and grinding operations shall not exceed 1.88 pounds per hour when operating at a process weight rate of 625 pounds per hour (5.0 fiberglass truck caps per hour x 125 pounds per fiberglass truck cap).

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

### Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

#### D.2.2 Particulate Matter (PM)

In order to comply with Condition D.2.1 the vacuum system connected to a baghouse for particulate matter control shall be in operation at all times that the cutting and grinding operations are in operation.

#### D.2.3 Compliance Schedule

The Permittee shall:

- (a) Install the vacuum system connected to a baghouse to control particulate matter emissions from the cutting and grinding operations, EU04 within sixty (60) days of the issuance date of this permit,
- (b) Submit a statement including the date that the control equipment has been installed and is operating to assure compliance with 326 IAC 6-3-2, and
- (c) Continue to comply with such requirements that become effective during the term of this permit.



## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (d) One (1) paint spray booth, known as EU05, constructed in 1990, exhausted through stack 05, equipped with one (1) HVLP spray gun, dry filters for particulate matter control, and a 1.9 million British thermal unit per hour propane-fired air makeup heater, capacity: 12.0 fiberglass truck caps per hour.
- (e) One (1) curing booth, known as EU06, constructed in 1990, exhausted through stack 06, capacity: 12.0 fiberglass truck caps per hour.
- (f) One (1) clear coat spray booth, known as EU07, constructed in 1999, exhausted through stack 07, equipped with one (1) HVLP spray gun, dry filters for particulate matter control, and a 1.5 million British thermal unit per hour propane-fired air makeup heater, capacity: 12.0 fiberglass truck caps per hour.
- (g) One (1) curing booth, known as EU08, equipped with two (2) 1.5 million British thermal unit per hour propane-fired air makeup heaters, constructed in 1999, exhausted through stacks 08 and 09, capacity: 8.0 fiberglass truck caps per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter from the one (1) paint spray booth, known as EU05, and one (1) clear coat spray booth, known as EU07, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance will be demonstrated by operating the dry filters at all times when the one (1) paint spray booth and one (1) clear coat spray booth are in operation.

#### D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) In order to avoid the requirements of 326 IAC 8-1-6, the input to the one (1) paint spray booth, known as EU05, will be limited to less than twenty-five (25) tons per year of volatile organic compounds (VOC) per twelve (12) consecutive month period.
- (b) The one (1) clear coat spray booth, known as EU07, potentially emits less than twenty-five (25) tons per year of volatile organic compounds (VOC), 326 IAC 8-1-6 does not apply to this booth. Any change or modification which would increase the potential to emit VOC to greater than twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM.

**D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and its control device.

**Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

**D.3.4 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.3.5 VOC Emissions**

Compliance with Condition D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.3.6 Particulate Matter (PM)**

In order to comply with Condition D.3.1, the dry filters for PM control shall be in operation at all times when the one (1) paint spray booth, known as EU05, and one (1) clear coat spray booth, known as EU07, are in operation.

**D.3.7 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the one (1) paint spray booth, known as EU05, and one (1) clear coat spray booth, known as EU07, stacks 05 and 07 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.3.8 Record Keeping Requirements**

- (a) To document compliance with Condition D.3.2(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.3.2(a).

- (1) The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each day;
  - (4) The total VOC usage for each day; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **SECTION D.4 FACILITY OPERATION CONDITIONS**

|   |
|---|
| <b>Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities</b> |
|---|

- |  |
|--|
| (h) One (1) bulk resin storage tank, known as EU11, to be constructed, capacity: 5,800 gallons of polyester resin. |
|--|

|  |
|--|
| (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.) |
|--|

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

#### **Construction Conditions**

##### **General Construction Conditions**

- D.4.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

##### **Effective Date of the Permit**

- D.4.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

#### **Operation Conditions**

There are no applicable operation conditions for this facility.

## SECTION D.5 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities - Existing

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (c) One (1) touch-up paint area in the aluminum caps shop, VOC emissions less than fifteen (15) pounds per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, and welding equipment, and the grinding and machining operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Swiss Caps  
Source Address: 2300 Highway 250, Patriot, Indiana 47038  
Mailing Address: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 Permit No.: T 155-10975-00005

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Swiss Caps  
Source Address: 2300 Highway 250, Patriot, Indiana 47038  
Mailing Address: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 Permit No.: T 155-10975-00005

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li><input checked="" type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

If any of the following are not applicable, mark N/A

|   |
|---|
| Facility/Equipment/Operation:                       |
|   |
| Control Equipment:                                  |
|   |
| Permit Condition or Operation Limitation in Permit: |
|   |
| Description of the Emergency:                       |
|   |
| Describe the cause of the Emergency:                |
|   |

If any of the following are not applicable, mark N/A

Page 2 of 2

|   |
|---|
| Date/Time Emergency started:  |
| Date/Time Emergency was corrected:  |
| Was the facility being properly operated at the time of the emergency?    Y    N<br>Describe:   |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:   |
| Estimated amount of pollutant(s) emitted during emergency:  |
| Describe the steps taken to mitigate the problem:   |
| Describe the corrective actions/response steps taken:   |
| Describe the measures taken to minimize emissions:  |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Swiss Caps  
Source Address: 2300 Highway 250, Patriot, Indiana 47038  
Mailing Address: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 Permit No.: T 155-10975-00005  
Facility: Two (2) polyester resin application booths, known as EU01 and EU02  
One (1) gel coat application booth, known as EU03  
Parameter: Volatile Organic HAP emissions  
Limit: Less than one hundred fifty-two (152) tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

| Month | VOC HAPs   | VOC HAPs           | VOC HAPs       |
|-------|------------|--------------------|----------------|
|       | This Month | Previous 11 Months | 12 Month Total |
|       |            |                    |                |
|       |            |                    |                |
|       |            |                    |                |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Swiss Caps  
Source Address: 2300 Highway 250, Patriot, Indiana 47038  
Mailing Address: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 Permit No.: T 155-10975-00005  
Facility: One (1) paint spray booth, known as EU05  
Parameter: Volatile Organic Compound (VOC) emissions  
Limit: Input limited to less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

| Month | VOC        | VOC                | VOC            |
|-------|------------|--------------------|----------------|
|       | This Month | Previous 11 Months | 12 Month Total |
|       |            |                    |                |
|       |            |                    |                |
|       |            |                    |                |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Swiss Caps  
Source Address: 2300 Highway 250, Patriot, Indiana 47038  
Mailing Address: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 Permit No.: T 155-10975-00005

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

|  |                               |
|--|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Part 70 Operating Permit**

#### **Source Background and Description**

**Source Name:** Swiss Caps  
**Source Location:** 2300 Highway 250, Patriot, Indiana 47038  
**County:** Switzerland  
**SIC Code:** 3799  
**Operation Permit No.:** T 155-10975-00005  
**Permit Reviewer:** Peter E. Fontaine

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Swiss Caps relating to the operation of a fiberglass truck cap and vehicle accessory manufacturing source.

#### **Permitted Emission Units and Pollution Control Equipment**

There are no permitted facilities operating at this source during this review process.

#### **Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted facilities/units:

- (a) Two (2) polyester resin application booths, known as EU01 and EU02, constructed in 1988, exhausted through stacks 01 and 02, respectively, equipped with one (1) air-assisted airless spray gun, each, and dry filters for particulate matter control, capacity: 8.0 fiberglass truck caps per hour, total.
- (b) One (1) gel coat application booth, known as EU03, constructed in 1988, exhausted through stack 03, equipped with one (1) air-assisted airless spray gun and dry filters for particulate matter control, capacity: 8.0 fiberglass truck caps per hour.
- (c) Cutting and grinding operations, known as EU04, constructed in 1988, equipped with two (2) dust collectors, known as CAT and HOG, exhausted into the general building ventilation, capacity: 5.0 fiberglass truck caps per hour.
- (d) One (1) paint spray booth, known as EU05, constructed in 1990, exhausted through stack 05, equipped with one (1) HVLP spray gun, dry filters for particulate matter control, and a 1.9 million British thermal unit per hour propane-fired air makeup heater, capacity: 12.0 fiberglass truck caps per hour.
- (e) One (1) curing booth, known as EU06, constructed in 1990, exhausted through stack 06, capacity: 12.0 fiberglass truck caps per hour.
- (f) One (1) clear coat spray booth, known as EU07, constructed in 1999, exhausted through stack 07, equipped with one (1) HVLP spray gun, dry filters for particulate matter control, and a 1.5 million British thermal unit per hour propane-fired air makeup heater, capacity: 12.0 fiberglass truck caps per hour.

- (g) One (1) curing booth, known as EU08, equipped with two (2) 1.5 million British thermal unit per hour propane-fired air makeup heaters, constructed in 1999, exhausted through stacks 08 and 09, capacity: 8.0 fiberglass truck caps per hour.

#### **New Emission Units and Pollution Control Equipment Receiving Prior Approval**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

- (h) One (1) bulk resin storage tank, known as EU11, to be constructed, capacity: 5,800 gallons of polyester resin.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (e) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (j) UV cure equipment.

### Existing Approvals

There are no prior approvals for this source.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is aware that the source was not issued a FESOP by December 14, 1996 nor did they submit a Part 70 application by that date.
- (c) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on May 17, 1999. Additional information was received on August 12, 1999, November 22, 1999, January 14, 2000, and April 18, 2000.

On January 14, 2000, the applicant requested a Part 70 Permit.

### Emission Calculations

See pages 1 through 6 of 6 of Appendix A of this document for detailed emissions calculations.

Since no grain loadings were provided for the two (2) dust collectors, known as CAT and HOG, emissions from the cutting and grinding operations were calculated using a process weight rate of 625 pounds per hour (5.0 fiberglass truck caps per hour x 125 pounds per fiberglass truck cap) from Form GSD-03, the allowable particulate matter emissions pursuant to 326 IAC 6-3-2, ninety nine and eight tenths (99.8%) percent collection efficiency, and 4,400 actual cubic feet per minute (acfm) air flow rate from Form CE-01. Testing will be required in order to show compliance with 326 IAC 6-3-2.

The one (1) bulk resin storage tank, known as EU11, has an estimated potential to emit VOC less than three (3.0) pounds per hour and less than fifteen (15.0) pounds per day. The estimated potential to emit styrene is less than five (5.0) pounds per day and less than one (1.0) ton per year. Therefore, the one (1) bulk resin storage tank will be considered as an insignificant activity.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.

| Pollutant        | Potential To Emit<br>(tons/year) |
|------------------|----------------------------------|
| PM               | 4,332                            |
| PM <sub>10</sub> | 4,332                            |
| SO <sub>2</sub>  | 0.00                             |
| VOC              | 181 (202)                        |
| CO               | 0.00                             |
| NO <sub>x</sub>  | 0.00                             |

The VOC value in parenthesis represents the potential VOC emissions with the maximum allowable monomer content pursuant to 326 IAC 8-1-6 as discussed on pages 7 through 9.

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

| HAPs          | Potential To Emit<br>(tons/year) |
|---------------|----------------------------------|
| Styrene       | 130                              |
| Xylene        | 9.02                             |
| Ethyl Benzene | 2.64                             |
| MIBK          | 6.84                             |
| Glycol Ethers | 1.04                             |
| TOTAL         | 150                              |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM<sub>10</sub> and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

#### Actual Emissions

No previous emission data has been received from the source.



### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units, after controls. The source has agreed to accept a volatile organic HAPs limit of less than one hundred fifty-two (152) tons per year from EU01 through EU03 in order to comply with 326 IAC 8-1-6. The source has also agreed to a volatile organic compound (VOC) limit of less than twenty-five (25) tons per year from EU05 in order to avoid the requirements of 326 IAC 8-1-6 (General Reduction Requirements for New Facilities). Emissions of all pollutants from EU05 have been ratioed to reflect the reduced input usages to the applicators necessary to meet the volatile organic HAP and volatile organic compound limits.

|                          | Limited Potential to Emit<br>(tons/year) |                  |                 |       |       |                 |       |
|--------------------------|--|------------------|-----------------|-------|-------|-----------------|-------|
| Process/facility         | PM                                       | PM <sub>10</sub> | SO <sub>2</sub> | VOC   | CO    | NO <sub>x</sub> | HAPs  |
| EU01 and EU02            | 1.57                                     | 1.57             | 0.00            | 50.5  | 0.00  | 0.00            | 50.5  |
| EU03                     | 1.13                                     | 1.13             | 0.00            | 101   | 0.00  | 0.00            | 101   |
| EU04                     | 8.23                                     | 8.23             | 0.00            | 0.00  | 0.00  | 0.00            | 0.00  |
| EU05 and EU06            | 0.0492                                   | 0.0492           | 0.00            | 25.0  | 0.00  | 0.00            | 10.4  |
| EU07 and EU08            | 0.0507                                   | 0.0507           | 0.00            | 20.9  | 0.00  | 0.00            | 7.26  |
| EU11                     | 0.00                                     | 0.00             | 0.00            | 0.500 | 0.00  | 0.00            | 0.200 |
| Propane Combustion       | 0.119                                    | 0.119            | 0.00            | 0.149 | 0.567 | 4.17            | 0.00  |
| Insignificant Activities | 10.0                                     | 10.0             | 0.00            | 5.00  | 0.00  | 0.00            | 0.500 |
| Total Emissions          | 21.1                                     | 21.1             | 0.00            | 203   | 0.567 | 4.17            | 170   |

### County Attainment Status

The source is located in Switzerland County.

| Pollutant        | Status     |
|------------------|------------|
| PM <sub>10</sub> | attainment |
| SO <sub>2</sub>  | attainment |
| NO <sub>2</sub>  | attainment |
| Ozone            | attainment |
| CO               | attainment |
| Lead             | attainment |

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Switzerland County has been designated as attainment or unclassifiable for ozone.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The resin storage tank is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.110, Subpart Kb, because the capacity of the tank is less than forty (40) cubic meters.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

The potential to emit of all pollutants, after controls, are less than 250 tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration), is not applicable.

#### **326 IAC 2-4.1-1 (New Source Toxics Rule)**

Since the source was constructed prior to the applicability date of July 27, 1997, 326 IAC 2-4.1-1 does not apply.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM<sub>10</sub> and volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### **326 IAC 5-1 (Opacity Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **326 IAC 6-4 (Fugitive Dust Emissions)**

Under no circumstance shall the source emit particulate matter to the extent that some visible portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) emissions from the two (2) polyester resin application booths, known as EU01 and EU02, one (1) gel coat application booth, known as EU03, one (1) paint spray booth, known as EU05, and one (1) clear coat spray booth, known as EU07 will each be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour.}$$

Compliance will be demonstrated by operating the dry filters at all times when the two (2) polyester resin application booths, one (1) gel coat application booth, one (1) paint spray booth, and one (1) clear coat spray booth are in operation.

- (b) The particulate matter (PM) emissions from the cutting and grinding operations, known as EU04, will be limited to 1.88 pounds per hour when operating at a process weight rate of 625 pounds per hour (5.0 fiberglass truck caps per hour x 125 pounds per fiberglass truck cap).

The potential PM emissions, after control from the two (2) dust collectors, known as CAT and HOG, controlling EU04, are 1.88 pounds per hour. Therefore, the cutting and grinding operations will comply with this rule.

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour.}$$

$$E = 4.10 (0.313)^{0.67} = 1.88 \text{ pounds per hour.}$$

Compliance will be demonstrated by operating the two (2) dust collectors, known as CAT and HOG, at all times when the cutting and grinding is taking place.

#### 326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

- (a) In order to avoid the requirements of 326 IAC 8-1-6, the one (1) paint spray booth, known as EU05, constructed in 1990, will limit the input of volatile organic compounds (VOC) to the applicators to less than twenty-five (25) tons per year per twelve (12) consecutive month period.
- (b) The Best Available Control Technology for VOC emissions from the two (2) polyester resin application booths and one (1) gel coat application booth is as follows:
- (1) Use of gel coats and resins that contain styrene shall be limited such that the potential to emit (PTE) VOCs for the two (2) polyester resin application booths and one (1) gel coat application booth shall be less than one hundred fifty-two (152) tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

- (A) VOC emissions from the application of gel coats and resins shall be calculated as volatile organic HAP emissions. Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
  - (B) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Associations, April 20, 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (2) The total monomer contents of all resins and gel coats used shall be limited to thirty five percent (35%) by weight for resins, thirty seven percent (37%) by weight for gel coats or their equivalent on an emissions mass basis.
- (A) HAP monomer contents shall be calculated on a neat basis, which means excluding any filler.
  - (B) Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.
  - (C) The use of resins with HAP monomer contents lower than 35%, gel coats with HAP monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with HAP monomer contents higher than 35%, and/or gel coats with HAP monomer contents higher than 37%. This is allowed to meet the HAP monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:  
  
(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) # (Emissions from 35% resin or 37% gel coat) - (Emissions from >35% resin, >37% gel coat, and/or using other emission reduction techniques).

Where:

Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF  
(HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (3) Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray mechanical applications of a design and specifications approved by IDEM, OAM.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

- (4) Optimized spray techniques according to a manner approved by IDEM, OAM shall be used for gel coats and filled resins at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (5) A one (1) quart, air-atomized spray gun may be used as needed for touch-up purposes only.

- (6) The listed work practices shall be followed:

(A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(B) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.

(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(vi) Storage containers shall be kept covered when not in use.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The two (2) polyester resin application booths and one (1) gel coat application booth have applicable compliance monitoring conditions as specified below:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (2) Daily visible emissions notations of the two (2) polyester resin application booths and one (1) gel coat application booth shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
  - (3) Monthly inspections shall be performed of the coating emissions from the two (2) polyester resin application booths and one (1) gel coat application booth stack exhausts, known as stacks 01, 02, and 03, respectively, and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (4) Compliance with HAP monomer content limits shall be demonstrated on a monthly basis.
- (5) Optimized spray techniques according to a manner approved by IDEM, OAM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.
- (6) The listed work practices shall be followed:
  - (A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (B) For VOC- and/or HAP-containing materials:
    - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.
    - (ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.
    - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
    - (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
    - (v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (C) All material storage containers shall be kept covered when not in use.

These monitoring conditions are necessary to ensure compliance with 326 IAC 8-1-6 (General Reduction Requirements for New Facilities), 326 IAC 5-1 (Opacity Limitations), and 326 IAC 6-4 (Fugitive Dust Emissions). The dry filters must operate properly to ensure compliance of the two (2) polyester resin application booths and one (1) gel coat application booth with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (b) The cutting and grinding operations have applicable compliance monitoring conditions as specified below:

- (1) Daily visible emissions notations of the cutting and grinding operations shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (2) An inspection shall be performed once per working shift of the two (2) dust collectors, known as CAT and HOG, exhausted into the general building ventilation. In the event that a dust collector failure has been observed:
  - (A) The effected emission units, known as EU04, will be shut down immediately until the failed or defective dust collector part(s) have been replaced or corrected.
  - (B) Based upon the findings of the inspection, any corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
- (3) The Permittee shall record the total static pressure drop across the dust collector, known as CAT, controlling EU04, at least once weekly when any of the cutting and grinding facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collector shall be maintained within the range of 1.0 to 2.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (4) The Permittee shall record the total static pressure drop across the dust collector, known as HOG, controlling EU04, at least once weekly when any of the cutting and grinding facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collector shall be maintained within the range of 3.0 to 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 6-4 (Fugitive Dust Emissions). The two (2) dust collectors, known as CAT and HOG, must operate properly to ensure the avoidance of 326 IAC 2-2 (PSD) and compliance of the cutting and grinding operations with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (c) The one (1) paint spray booth and one (1) clear coat spray booth have applicable compliance monitoring conditions as specified below:



- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (2) Monthly inspections shall be performed of the coating emissions from the one (1) paint spray booth and one (1) clear coat spray booth stack exhausts, known as stacks 05 and 07, respectively, and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 6-4 (Fugitive Dust Emissions). The dry filters must operate properly to ensure compliance of the one (1) paint spray booth and one (1) clear coat spray booth with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached pages 2 through 6 of 6 of Appendix A for detailed air toxic calculations.

### **Conclusion**

The operation of this fiberglass truck cap and vehicle accessory manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 155-10975-00005**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

**Source Name:** Swiss Caps  
**Source Location:** 2300 Highway 250, Patriot, Indiana 47038  
**County:** Switzerland  
**SIC Code:** 3799  
**Operation Permit No.:** T 155-10975-00005  
**Permit Reviewer:** Mark L. Kramer

On June 1, 2000, the Office of Air Management (OAM) had a notice published in the Rebeille Enterprise, Vevay, Indiana, stating that Swiss Caps had applied for a Part 70 Operating Permit to operate a fiberglass truck cap and vehicle accessory manufacturing source with control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On July 12, Evelyn Crooks of Environmental Compliance Source, Ltd., consultant, submitted comments on behalf of Swiss Caps on the proposed Part 70 Operating Permit and supplemented with correspondence received on September 6 and 22, 2000. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

#### **Comment 1:**

A series of sample cuts were made in representative fiberglass pieces. Using the data from those samples, the particulate generated averages 0.33 pounds per cap. Dust loss from the "scuffing" was not detectable. With a maximum process rate of 5 caps per hour, the dust generation rate is estimated to be 1.65 pounds per hour. The TSD spreadsheet has not been revised because the proposed Dust Hog controls are not in place.

Swiss Caps recognizes that the particulate matter potential to emit is greater than 25 pounds per day. However, the current generation rate is less than 20 pounds per day. The control units are not now needed. The draft permit language requires the reading of pressure drop gauges on the control units. Swiss Caps does not believe these proposed units have that capability especially during the cleaning cycle. We are currently exploring other equipment options that will have high efficiency capture ratings. Swiss Caps does not agree that the potential-to-emit warrants a stack test of this control equipment and cannot accept that condition (D.2.3).

Additional information received September 6, 2000 stated that PM emissions were estimated at 7.66 ounces per cap and 3.2 ounces per lid (smaller than a small cap), equivalent to 13.575 pounds per day for actual production of 20 caps and 20 lids. Swiss Caps can only process caps or lids, but not both simultaneously. Swiss Caps has learned that the cutting tools are equipped with adaptors to permit the attachment of vacuum hoses and is studying the feasibility of using this technology as a dust control system. At this time, it is Swiss Caps position that control is not required for this operation, but they may choose to install controls at a later date.

### Response 1:

The allowable PM emission of 1.88 pounds per hour for the cutting and grinding operations were calculated using a process weight rate of 625 pounds per hour (5.0 fiberglass truck caps per hour x 125 pounds per fiberglass truck cap) by the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Since potential PM emission were estimated to be 7.66 ounces per cap for 5 caps per hour, the potential PM emission rate is: 7.66 oz of PM/cap x 5 caps/hr x 1 lb/16 oz = 2.39 pounds per hour.

Thus, the cutting and grinding operations would be non-compliant without controls. Evelyn Crooks of Environmental Compliance Source, Ltd., has confirmed that a vacuum system supporting up to three (3) 1.25 inch diameter hoses with a 80 cubic feet per minute flow rate per hose connected to a baghouse will be installed. The manufacturer's specification for this vacuum system with a baghouse states a PM control efficiency of ninety-nine (99%).

1. Therefore, the equipment list in Condition A.2 and Section D.2 have been revised and a compliance schedule has been added as Condition D.2.3 as follows:

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary fiberglass truck cap and vehicle accessory manufacturing source consists of the following emission units and pollution control devices:

- (c) Cutting and grinding operations, known as EU04, constructed in 1988, **to be** equipped with **a vacuum system connected to a baghouse**, ~~two (2) dust collectors, known as CAT and HOG,~~ exhausted into the general building ventilation, capacity: 5.0 fiberglass truck caps per hour.

### SECTION D.2 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)]

- (c) Cutting and grinding operations, known as EU04, constructed in 1988, **to be** equipped with **a vacuum system connected to a baghouse**, ~~two (2) dust collectors, known as CAT and HOG,~~ exhausted into the general building ventilation, capacity: 5.0 fiberglass truck caps per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### D.2.3 Compliance Schedule The Permittee shall:

- (a) Install the vacuum system connected to a baghouse to control particulate matter emissions from the cutting and grinding operations, EU04 within sixty (60) days of the issuance date of this permit,

- (b) **Submit a statement including the date that the control equipment has been installed and is operating to assure compliance with 326 IAC 6-3-2, and**
  - (c) **Continue to comply with such requirements that become effective during the term of this permit.**
2. The TSD stated that the potential PM emission from cutting and grinding, EU04, based on grain loading was 4,117 tons per year and 8.23 tons per year after controls. Based on a potential PM emission rate of 2.39 pounds per hour, the potential PM emissions are 10.5 tons per year and 0.105 tons of PM after control.

Thus, the following tables from the TSD for the entire source's PM and PM<sub>10</sub> emission rates are updated as follows:

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.

| Pollutant        | Potential To Emit<br>(tons/year) |
|------------------|----------------------------------|
| PM               | 226                              |
| PM <sub>10</sub> | 226                              |

|                          | Limited Potential to Emit (tons/year) |                  |                 |       |       |                 |       |
|--------------------------|---------------------------------------|------------------|-----------------|-------|-------|-----------------|-------|
| Process/facility         | PM                                    | PM <sub>10</sub> | SO <sub>2</sub> | VOC   | CO    | NO <sub>x</sub> | HAPs  |
| EU01 and EU02            | 1.57                                  | 1.57             | 0.00            | 50.5  | 0.00  | 0.00            | 50.5  |
| EU03                     | 1.13                                  | 1.13             | 0.00            | 101   | 0.00  | 0.00            | 101   |
| EU04                     | 0.105                                 | 0.105            | 0.00            | 0.00  | 0.00  | 0.00            | 0.00  |
| EU05 and EU06            | 0.0492                                | 0.0492           | 0.00            | 25.0  | 0.00  | 0.00            | 10.4  |
| EU07 and EU08            | 0.0507                                | 0.0507           | 0.00            | 20.9  | 0.00  | 0.00            | 7.26  |
| EU11                     | 0.00                                  | 0.00             | 0.00            | 0.500 | 0.00  | 0.00            | 0.200 |
| Propane Combustion       | 0.119                                 | 0.119            | 0.00            | 0.149 | 0.567 | 4.17            | 0.00  |
| Insignificant Activities | 10.0                                  | 10.0             | 0.00            | 5.00  | 0.00  | 0.00            | 0.500 |
| Total Emissions          | 13.0                                  | 13.0             | 0.00            | 203   | 0.567 | 4.17            | 170   |

3. Thus, the requirements of 326 IAC 2-2 would not have been applicable to the cutting and grinding operations without control since the potential to emit PM before controls is less than 250 tons per year. Therefore, the reference to 326 IAC 2-2 in Condition D.2.1(b) has been deleted as follows:

#### Emission Limitations and Standards

##### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

- ~~(a)~~ Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter emission rate from the cutting and grinding operations shall not exceed 1.88 pounds per hour when operating at a process weight rate of 625 pounds per hour (5.0 fiberglass truck caps per hour x 125 pounds per fiberglass truck cap).

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- ~~(b) Compliance with the particulate matter limit pursuant to 326 IAC 6-3-2 will make 326 IAC 2-2 not applicable.~~

4. Testing is no longer required for these operations and therefore, Conditions D.2.3 and D.2.10 have been deleted. Condition D.2.4 has been revised to reflect the proposed change in control devices and has been renumbered as Condition D.2.2 as follows:

#### Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

##### ~~D.2.3 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]~~

~~During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.~~

##### D.2.24 Particulate Matter (PM)

**In order to comply with Condition D.2.1, the vacuum system connected to a baghouse two (2) dust collectors, known as CAT and HOG, for particulate matter control shall be in operation at all times that the cutting and grinding operations are in operation.**

##### ~~D.2.10 Reporting Requirements~~

~~To document compliance with Condition D.2.3, all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period. The report submitted by the Permittee does not require the certification of the "responsible official" as defined by 326 IAC 2-7-1(34).~~

5. Since the cutting and grinding operations with controls have an allowable PM emission rate of 1.88 pounds per hour, which is less than ten (10) pounds per hour, these operations no longer require either preventive maintenance, compliance monitoring or record keeping. Therefore, Conditions C.13, D.2.2, D.2.5, D.2.6, D.2.7, D.2.8 and D.2.9 have been deleted.

~~C.13 — Pressure Gauge Specifications~~

~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.~~

~~D.2.2 — Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control devices.~~

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

~~D.2.5 — Visible Emissions Notations~~

- ~~(a) — Daily visible emission notations of the cutting and grinding operations exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) — For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) — In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) — A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) — The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

~~D.2.6 — Parametric Monitoring~~

~~The Permittee shall record the total static pressure drop across the two (2) dust collectors, known as CAT and HOG, used in conjunction with the cutting and grinding operations, at least once weekly when the cutting and grinding is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the two (2) dust collectors, known as CAT and HOG, shall be maintained within the range of 1.0 and 2.0 inches of water and 3.0 and 4.0 inches of water, respectively, or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~

~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~

~~D.2.7 — Monitoring~~

- ~~(a) — Daily inspections of the dust collector, known as HOG, shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dust collector dry filters, weekly observations shall be made of the overspray from the cutting and grinding operations while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

- (b) ~~Monthly inspections shall be performed of the cutting and grinding emissions from the two (2) dust collectors and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~D.2.8 Broken or Failed Bag Detection~~

~~In the event that the dust collector, known as CAT, bag failure has been observed:~~

- (a) ~~The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- (b) ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

~~D.2.9 Record Keeping Requirements~~

- (a) ~~To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the cutting and grinding exhaust once per shift during normal daylight operations when exhausting to the atmosphere.~~
- (b) ~~To document compliance with Condition D.2.6, the Permittee shall maintain the following:~~
  - (1) ~~Weekly records of the following operational parameters during normal operation when venting to the atmosphere:~~
    - (A) ~~Inlet and outlet differential static pressure; and~~
    - (B) ~~Cleaning cycle: frequency and differential pressure~~
  - (2) ~~Documentation of all response steps implemented, per event .~~
  - (3) ~~Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
  - (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
  - (5) ~~Operator standard operating procedures (SOP).~~
  - (6) ~~Manufacturer's specifications or its equivalent.~~

- ~~(7) — Equipment "troubleshooting" contingency plan.~~
- ~~(8) — Documentation of the dates vents are redirected.~~
- ~~(c) — All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

**Comment 2:**

There is an apparent contradiction in Conditions D.3.7(a) and D.3.8(a). The visible emissions from the paint booth stacks are typically required once per week as specified in D.3.8(a). Swiss Caps only operates 1 shift. We request that the per shift readings for these units be changed to weekly.

**Response 2:**

Condition D.3.7 (Visible Emissions Notations) has been deleted since the compliance monitoring Condition D.3.8 (now D.3.7) are sufficient for the surface coating spray booths. Therefore, the associated record keeping in Condition D.3.9(b) has also been deleted. All remaining conditions have been renumbered:

~~D.3.7 Visible Emissions Notations~~

- ~~(a) — Daily visible emission notations of the one (1) paint spray booth, known as EU05, and one (1) clear coat spray booth, known as EU07, stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) — For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) — In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) — A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) — The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

~~D.3.9 Record Keeping Requirements~~

- ~~(a) — To document compliance with Condition D.3.2(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.3.2(a).~~
  - ~~(1) — The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
  - ~~(2) — A log of the dates of use;~~
  - ~~(3) — The cleanup solvent usage for each day;~~
  - ~~(4) — The total VOC usage for each day; and~~



- (5) The weight of VOCs emitted for each compliance period.
- (b) ~~To document compliance with Condition D.3.7, the Permittee shall maintain records of daily visible emission notations of the one (1) paint spray booth, known as EU05, and one (1) clear coat spray booth, known as EU07, stack exhausts once per shift during normal day-light operations when exhausting to the atmosphere.~~
- (be) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment 3:**

There is also one (1) insignificant activity that should be added to the permit. Touch-up paint is occasionally used in the aluminum caps shop. The quantity is typically less than one 16 oz can per day. The VOC will not exceed 15 pounds per day.

**Response 3:**

It is duly noted that the following insignificant activity exists at the source, but as long as the activity remains below the insignificant thresholds of fifteen (15) pounds per day of VOC, there are no applicable rules. Although there are no rules, this insignificant activity has been added as requested to Condition A.3 (Specifically Regulated Insignificant Activities) and also in Section D.4 as follows:

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

This stationary fiberglass truck cap and vehicle accessory manufacturing source also includes the following insignificant activities ~~which are specifically regulated~~, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (c) **One (1) touch-up paint area in the aluminum caps shop, VOC emissions less than fifteen (15) pounds per day.**

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~ and new language is **bolded**):

**Front Page**

1. The expiration has been added to the signature box. The expiration is exactly 5 years after the issuance date. For example, if the permit was issued December 13, 1996, the expiration date would be December 13, 2001.

|   |   |
|---|---|
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date:<br><br><b>Expiration Date:</b> |
|---|---|

## Section A

2. Condition A.1 (General Information) has had the following rule cite added which is the definition of a major source in 326 IAC 2-7. IDEM is no longer including the phone number of the contact person, because it is cumbersome to do an administrative amendment every time the telephone number is changed as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] **[326 IAC 2-7-1(22)]**

Phone Number: ~~812-594-2810~~

## Section B

3. Condition B.1 (Permit No Defense) has been deleted. This is not in IC13, but IDEM has the general authority for this in 326 IAC 2-7-15. Therefore, most of this language has been added to Condition B.14 (now B.13)(Permit Shield). Condition B.14 (now B.13) provides for when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance. All other B conditions have been re-numbered as a result of this change.

~~B.1 Permit No Defense [IC 13]~~

~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~

~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

4. Condition B.3 (now B.2) (Permit Term) has had language added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be five (5) years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the **effective original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

5. Condition B.8 (now B.7) (Duty to Supplement and Provide Information) The condition has been reworded to match the language in the rule as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] **[326 IAC 2-7-6(6)]**

- 
- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). **Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]**

- (c) ~~Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit.~~ The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. ~~If requested by IDEM, OAM, or the U.S. EPA, to~~ **When** furnishing copies of requested records directly to U. S. EPA, ~~then the Permittee must furnish record directly to the U. S. EPA.~~ The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

6. Condition B.9 (now B.8) (Compliance with Permit Conditions) (c) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures as follows:

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

- 
- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.**

7. Condition B.10 (now B.9)(Certification) (b) has been modified to clarify when a certification is needed as follows:

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

---

- (b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.
8. Condition B.11 (now B.10) (Annual Compliance Certification) paragraph (a) has been revised to clarify that the initial certification is from the date of issuance until December 31. Paragraph (c) has been revised so that it matches the language in the rule.

As part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law in Condition B.11(c) (now B.10(c)) as follows:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** The certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
  - (4) The methods used for determining **the** compliance **status** of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

9. Condition B.12 (now B.11) (Preventive Maintenance Plan) the record keeping requirements have been added to this condition.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

---

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond it's the **Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
  - (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
  - (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**
10. In Condition B.13 (now B.12)(Emergency Provisions) a reference to the Emergency Occurrence Report Form has been added to Condition B.13(b)(5) (now B.12(b)(5)). The emergency form is for emergencies only , and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. In paragraph (d), part of the first sentence has been deleted. Since this is a Part 70 source, the malfunction rule has been superseded by the emergency rule. Paragraph (f) "compliance" has been changed to "accordance".

**B.13 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** notice, either ~~in writing by mail or facsimile, of the emergency to:~~

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

11. Condition B.14 (now B.13)(Permit Shield)has incorporated some of the language from Condition B.1. In Condition B.14(d) some of the language has been removed because it is unnecessary and would be contradictory to IDEM's revision of operating permits as follows:

**B.14 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit,~~ IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and



- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
  - (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
  - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
  - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]
12. Condition B.16 (now B.15) (Deviations from Permit Requirements and Conditions) has been revised because IDEM is no longer requiring sources to report deviations in 10 days. Sources will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since IDEM relaxed the ten (10) day notification to a quarterly report.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch **Data Section**, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~

**The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
  - ~~(3)~~**(2)** Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

~~(e) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

13. Condition B.19 (now B.18) (Permit Amendment or Modification) 326 IAC 2-7-4(f) revised to clarify that all applications need to be certified by the responsible official. EPA has also requested this change.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

14. Condition B.21 (now B.20) (Operational Flexibility) (b) has been reorganized. Paragraph (b)(1) was deleted so that this condition would be consistent with the language in the rule as follows:

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). ~~and the following additional conditions:~~

~~(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

~~(A)~~(1) A brief description of the change within the source;

~~(B)~~(2) The date on which the change will occur;

~~(C)~~(3) Any change in emissions; and

~~(D)~~(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

15. Condition B.22 (now B.21) (Source Modification Requirement) has had the cite 326 IAC 2 added to make the condition more complete. The language "applicable provisions" has been removed because it is unnecessary as follows:

**B.22 Source Modification Requirement [326 IAC 2] [326 IAC 2-7-10.5]**

A modification, construction, or reconstruction is governed by the applicable provisions of **326 IAC 2 and 326 IAC 2-7-10.5.**

16. Condition B.23 (now B.22) (Inspection and Entry), the wording "At reasonable times" has been deleted because neither the rule nor the statute limits IDEM. IDEM could ask for these at any time.

**B.23 Inspection and Entry [326 IAC 2-7-6(2)] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, ~~at reasonable times~~, any records that must be kept under the conditions of this permit;
- (c) Inspect, ~~at reasonable times~~, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, ~~at reasonable times~~, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. ~~{326 IAC 2-7-6(6)}~~

17. Condition B.24 (now B.23) (Transfer of Ownership or Operational Control) has been revised to clarify that 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official. EPA has also requested this change.

**B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

18. Condition B.25 (now B.24) (Annual Fee Payment) has had the rule cite added to paragraph (a) as follows:

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. **Pursuant 326 IAC 2-7-19(b)**, if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

19. Condition B.26 (now B.25) (Advanced Source Modification Approval) has had language added to clarify the requirements of paragraph (b).

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if ~~failure to commence~~ construction of the emission unit **has not commenced** within eighteen (18) months from the date of issuance of the permit, or if during the construction, ~~of~~ work is suspended for a continuous period of one (1) year or more.

**Section C**

20. Condition C.6 (Operation of Equipment) has been revised to clarify the condition as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided **by statute, rule, or** in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

21. Condition C.7 (Stack Height) has had language added to clarify which parts of 326 IAC 1-7 are not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

22. Condition C.8 (Asbestos Abatement Projects) has had the rule cite in the title changed to make it more generalized as follows:.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~ **[40 CFR 61, Subpart M]**

23. Condition C.9 (Performance Testing) has had the word "within" changed to "not later than" as follows:

C.9 Performance Testing [326 IAC 3-6]

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

24. Condition C.11 (Compliance Monitoring) - There are times when compliance monitoring is required by a MACT that the source does not have to comply with yet. Therefore, language has been added to clarify that the permit will specify when Compliance Monitoring does not have to start in ninety (90) days. The same idea applies to new units, if the MACT does not apply yet, IDEM would not expect the source to start compliance monitoring.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

**Unless otherwise specified in this permit,** all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Unless otherwise specified in the approval for the new emission unit(s)**, compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

25. Condition C.12 (Monitoring Methods) has had the following rule cites added.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

26. Condition C.15 (now C.14) (Risk Management Plan) has been revised to reflect the fact that if a source is subject to 40 CFR 68, they should have already submitted a Risk Management Plan as follows:

**C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a)~~; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

27. Condition C.16 (now C.15) (Compliance Monitoring Plan - Failure to Take Response Steps) has had the following changes made: (a) "of" was added, (c) ";or" has been replaced with a period, (f) "(5%)" has been added to be consistent with the rest of the permit and changes were made to (a)(5) and (f).

**C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole **of** information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
  - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps ~~shall~~ **may** constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~;~~~~or~~
  - (3) An automatic measurement was taken when the process was not operating.~~;~~~~or~~
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) ~~If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.~~

~~(1)~~ — At its discretion, IDEM may excuse **the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides** ~~such failure providing~~ adequate justification ~~is documented~~ and **documents that** such failures do not exceed five percent **(5%)** of the operating time in any quarter.

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

28. In Condition C.17 (now C.16) (Actions Related to Noncompliance Demonstrated by a Stack Test), the phrase "corrective actions" has been changed to "response actions" to be consistent with the rest of the permit as follows:

C.16 ~~Actions Related to Noncompliance Demonstrated by a Stack Test~~ [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the ~~corrective~~ **response** actions are being implemented.

29. Condition C.18 (now C.17) (Emission Statement) the word "estimated" was added to (a)(1) and (a)(2) because that is how 326 IAC 2-6 describes emissions as follows.

C.18. ~~Emission Statement~~ [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

(1) Indicate **estimated** actual emissions of criteria pollutants from the source;

(2) Indicate **estimated** actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

30. Condition C.19 (now C.18) (General Record Keeping Requirements) the word "monitoring" was removed so that the condition will seem more generalized to all record keeping, the word "reports" was added to clarify that the source must keep copies of those as well. Paragraphs (b) and (c) have been removed because they were unnecessary.

C.19 ~~General Record Keeping Requirements~~ [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) — Records of required monitoring information shall include, where applicable:~~



- ~~(1) — The date, place, and time of sampling or measurements;~~
- ~~(2) — The dates analyses were performed;~~
- ~~(3) — The company or entity performing the analyses;~~
- ~~(4) — The analytic techniques or methods used;~~
- ~~(5) — The results of such analyses; and~~
- ~~(6) — The operating conditions existing at the time of sampling or measurement.~~
- ~~(c) — Support information shall include, where applicable:~~
  - ~~(1) — Copies of all reports required by this permit;~~
  - ~~All original strip chart recordings for continuous monitoring instrumentation;~~
  - ~~(3) — All calibration and maintenance records;~~
  - ~~(4) — Records of preventive maintenance.~~
- ~~(d)~~**(b) Unless otherwise specified in this permit,** all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

31. Condition C.20 (now C.19) (General Reporting Requirements) has changed the Semi-Annual Compliance Monitoring Report to the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report has been deleted. All the information is in Condition B.13. In paragraph (d) IDEM has clarified that the report does need to be certified by the responsible official. This change is also reflected in all the D sections and the reporting forms. EPA has also requested this change.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit **a the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent.** Any deviation from ~~the permit~~ requirements, ~~and~~, the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(e) All instances of deviations as described in Section B--Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(g)~~(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

#### Section D

32. Conditions D.1.4 (Volatile Organic HAPs) and D.3.4 Volatile Organic Compounds (VOC) the last sentence of each has been removed, it is unnecessary since the permit contains Condition C.10 Compliance Requirements.

##### D.1.4 Volatile Organic HAPs

Compliance with the volatile organic HAPs content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. ~~IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

##### D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. ~~IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

33. Conditions D.1.6 and D.3.6 (Particulate Matter (PM)) has had language added to clarify which condition requires that the dry filters and baghouse are operated for compliance.

##### D.1.6 Particulate Matter (PM)

**In order to comply with Condition D.1.2,** tThe dry filters for PM control shall be in operation at all times when any of the two (2) polyester resin application booths or one (1) gel coat application booth are in operation.

##### D.3.6 Particulate Matter (PM)

**In order to comply with Condition D.3.1,** tThe dry filters for PM control shall be in operation at all times when the one (1) paint spray booth, known as EU05, and one (1) clear coat spray booth, known as EU07, are in operation.

34. Condition D.1.9 (Reporting Requirements) have been revised to require that these reports should be certified by the responsible official. Part 70 requires all reports to be certified. EPA has also requested this change.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Forms

35. Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section. IDEM has negotiated with EPA on the reporting of emergencies. They agree to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified.
36. The monthly and quarterly reports will now need to be certified by the responsible official, therefore the last line in each of these reports have been changed from ~~"A certification is not required for this report."~~ to **"Attach a signed certification to complete this report"**.
37. The Semi-Annual Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. IDEM is no longer requiring sources to report deviations in ten days, therefore every source will need submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION **BRANCH**  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967

PART 70 OPERATING PERMIT  
EMERGENCY/~~DEVIATION~~ **OCCURRENCE** REPORT

Source Name: Swiss Caps  
Source Address: 2300 Highway 250, Patriot, Indiana 47038  
Mailing Address: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 Permit No.: T 155-10975-00005

This form consists of 2 pages

Page 1 of 2

|                             |   |
|-----------------------------|---|
| Check either No. 1 or No. 2 |   |
| 9 1. —                      | This is an emergency as defined in 326 IAC 2-7-1(12)<br><input checked="" type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<br><input checked="" type="checkbox"/> The Permittee must submit notice in writing by mail or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 2. —                      | <del>This is a deviation, reportable per 326 IAC 2-7-5(3)(C)</del><br><del><input checked="" type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days</del>  |

If any of the following are not applicable, mark N/A

|   |
|---|
| Facility/Equipment/Operation:                               |
| Control Equipment:  |
| Permit Condition or Operation Limitation in Permit:         |
| Description of the Emergency/ <del>Deviation</del> :        |
| Describe the cause of the Emergency/ <del>Deviation</del> : |

If any of the following are not applicable, mark N/A

Page 2 of 2

|   |
|---|
| Date/Time Emergency/ <del>Deviation</del> started:  |
| Date/Time Emergency/ <del>Deviation</del> was corrected:  |
| Was the facility being properly operated at the time of the emergency/ <del>deviation</del> ?      Y      N<br>Describe:  |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:   |
| Estimated amount of pollutant(s) emitted during emergency/ <del>deviation</del> :   |
| Describe the steps taken to mitigate the problem:   |
| Describe the corrective actions/response steps taken:   |
| Describe the measures taken to minimize emissions:  |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT  
**QUARTERLY SEMI-ANNUAL DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: Swiss Caps  
Source Address: 2300 Highway 250, Patriot, Indiana 47038  
Mailing Address: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 Permit No.: T 155-10975-00005

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

|   |                               |
|---|-------------------------------|
| <p>This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted <b>quarterly semi-annually</b> based on a calendar year. Any deviation from the compliance monitoring requirements, and the date(s) of each deviation, <b>the probable cause of the deviation, and the response steps taken</b> must be reported. with the following exceptions: <b>Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.</b> Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p> |                               |
| <p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>  |                               |
| <p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>  |                               |
| <p>Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #)</p>   |                               |
| <p>Date of each Deviation:</p>  | <p>Duration of Deviation:</p> |
| <p>Number of Deviations:</p>  |                               |
| <p>Probable Cause of Deviation:</p>   |                               |
| <p>Response Steps Taken:</p>  |                               |
| <p>Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #)</p>   |                               |
| <p>Date of each Deviation:</p>  | <p>Duration of Deviation:</p> |
| <p>Number of Deviations:</p>  |                               |
| <p>Probable Cause of Deviation:</p>   |                               |
| <p>Response Steps Taken:</p>  |                               |

|  |                        |
|--|------------------------|
| Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #) |                        |
| Date of each Deviation:  | Duration of Deviation: |
| Number of Deviations:  |                        |
| Probable Cause of Deviation:   |                        |
| Response Steps Taken:  |                        |

|  |                        |
|--|------------------------|
| Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #) |                        |
| Date of each Deviation:  | Duration of Deviation: |
| Number of Deviations:  |                        |
| Probable Cause of Deviation:   |                        |
| Response Steps Taken:  |                        |

|  |                        |
|--|------------------------|
| Compliance Monitoring <b>Permit</b> Requirement (specify permit condition #) |                        |
| Date of each Deviation:  | Duration of Deviation: |
| Number of Deviations:  |                        |
| Probable Cause of Deviation:   |                        |
| Response Steps Taken:  |                        |

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Summary of Emissions

Company Name: Swiss Caps  
 Address City IN Zip: 2300 Highway 250, Patriot, Indiana 47038  
 Part 70 No.: T155-10975  
 Plt ID: 155-00005  
 Reviewer: Peter E. Fountaine  
 Date: May 17, 1999

## Total Potential Emissions

|                                 | PM<br>(tons/yr) | PM10<br>(tons/yr) | NOx<br>(tons/yr) | CO<br>(tons/yr) | VOC<br>(tons/yr) | Styrene<br>(tons/yr) | Xylene<br>(tons/yr) | Ethyl Benzene<br>(tons/yr) | MIBK<br>(tons/yr) | Glycol Ethers<br>(tons/yr) |
|---------------------------------|-----------------|-------------------|------------------|-----------------|------------------|----------------------|---------------------|----------------------------|-------------------|----------------------------|
| <b>EU01 and EU02</b>            | 121             | 121               | 0.00             | 0.00            | 40.0             | 40.0                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU03</b>                     | 87.3            | 87.3              | 0.00             | 0.00            | 90.2             | 90.2                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU04</b>                     | 4117            | 4117              | 0.00             | 0.00            | 0.00             | 0.00                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU05 and EU06</b>            | 2.07            | 2.07              | 0.00             | 0.00            | 29.4             | 0.00                 | 3.24                | 1.37                       | 6.84              | 0.832                      |
| <b>EU07 and EU08</b>            | 4.28            | 4.28              | 0.00             | 0.00            | 20.9             | 0.00                 | 5.78                | 1.27                       | 0.00              | 0.207                      |
| <b>EU11</b>                     | 0.00            | 0.00              | 0.00             | 0.00            | 0.500            | 0.200                | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>Total Potential to Emit:</b> | <b>4332</b>     | <b>4332</b>       | <b>0.00</b>      | <b>0.00</b>     | <b>181</b>       | <b>130</b>           | <b>9.02</b>         | <b>2.64</b>                | <b>6.84</b>       | <b>1.04</b>                |

Total Combined Potential HAPs: 150

## Total Potential Emissions After Particulate Matter Control and a twenty five (25) ton per year VOC emission limit on EU-05 and EU-06

|                      | PM<br>(tons/yr) | PM10<br>(tons/yr) | NOx<br>(tons/yr) | CO<br>(tons/yr) | VOC<br>(tons/yr) | Styrene<br>(tons/yr) | Xylene<br>(tons/yr) | Ethyl Benzene<br>(tons/yr) | MIBK<br>(tons/yr) | Glycol Ethers<br>(tons/yr) |
|----------------------|-----------------|-------------------|------------------|-----------------|------------------|----------------------|---------------------|----------------------------|-------------------|----------------------------|
| <b>EU01 and EU02</b> | 1.62            | 1.62              | 0.00             | 0.00            | 40.0             | 40.0                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU03</b>          | 1.17            | 1.17              | 0.00             | 0.00            | 90.2             | 90.2                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU04</b>          | 8.23            | 8.23              | 0.00             | 0.00            | 0.00             | 0.00                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU05 and EU06</b> | 0.0492          | 0.0492            | 0.00             | 0.00            | 25.0             | 0.00                 | 2.76                | 1.16                       | 5.82              | 0.707                      |
| <b>EU07 and EU08</b> | 0.0507          | 0.0507            | 0.00             | 0.00            | 20.9             | 0.00                 | 5.78                | 1.27                       | 0.00              | 0.207                      |
| <b>EU11</b>          | 0.00            | 0.00              | 0.00             | 0.00            | 0.500            | 0.200                | 0.00                | 0.00                       | 0.00              | 0.00                       |
|                      | <b>11.1</b>     | <b>11.1</b>       | <b>0.00</b>      | <b>0.00</b>     | <b>177</b>       | <b>130</b>           | <b>8.54</b>         | <b>2.43</b>                | <b>5.82</b>       | <b>0.914</b>               |

Total Combined HAPs: 148 (tons/yr)

## Total Limited Emissions From EU-01 through EU-03 Pursuant to 326 IAC 8-1-6 After Particulate Matter Control and a twenty five (25) ton per year VOC emission limit on EU-05 and EU-06

|                      | PM<br>(tons/yr) | PM10<br>(tons/yr) | NOx<br>(tons/yr) | CO<br>(tons/yr) | VOC<br>(tons/yr) | Styrene<br>(tons/yr) | Xylene<br>(tons/yr) | Ethyl Benzene<br>(tons/yr) | MIBK<br>(tons/yr) | Glycol Ethers<br>(tons/yr) |
|----------------------|-----------------|-------------------|------------------|-----------------|------------------|----------------------|---------------------|----------------------------|-------------------|----------------------------|
| <b>EU01 and EU02</b> | 1.57            | 1.57              | 0.00             | 0.00            | 50.5             | 50.5                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU03</b>          | 1.13            | 1.13              | 0.00             | 0.00            | 101              | 101                  | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU04</b>          | 8.23            | 8.23              | 0.00             | 0.00            | 0.00             | 0.00                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| <b>EU05 and EU06</b> | 0.0492          | 0.0492            | 0.00             | 0.00            | 25.0             | 0.00                 | 2.76                | 1.16                       | 5.82              | 0.707                      |
| <b>EU07 and EU08</b> | 0.0507          | 0.0507            | 0.00             | 0.00            | 20.9             | 0.00                 | 5.78                | 1.27                       | 0.00              | 0.207                      |
| <b>EU11</b>          | 0.00            | 0.00              | 0.00             | 0.00            | 0.500            | 0.200                | 0.00                | 0.00                       | 0.00              | 0.00                       |
|                      | <b>11.0</b>     | <b>11.0</b>       | <b>0.00</b>      | <b>0.00</b>     | <b>198</b>       | <b>152</b>           | <b>8.54</b>         | <b>2.43</b>                | <b>5.82</b>       | <b>0.914</b>               |

Total Combined HAPs: 169 (tons/yr)

Note: Styrene is a Volatile Organic Compound (VOC)

Pursuant to 326 IAC 8-1-6 General Reduction Requirements for New Facilities, the limited VOC (Styrene) emissions from the resin and gelcoat operations are greater than the potential VOC (Styrene) emissions

The Total Limited Emissions From EU-01 through EU-03 are greater than the potential emissions due to the larger monomer content limit pursuant to 326 IAC 8-1-6.

The actual monomer contents are less than the 326 IAC 8-1-6 requirements

This table represents the maximum VOC emissions from each facility at this source

|                      | VOC<br>(tons/yr) |
|----------------------|------------------|
| <b>EU01 and EU02</b> | 50.5             |
| <b>EU03</b>          | 101              |
| <b>EU04</b>          | 0.00             |
| <b>EU05 and EU06</b> | 29.4             |
| <b>EU07 and EU08</b> | 20.9             |
| <b>EU11</b>          | 0.500            |
|                      | <b>202</b>       |



**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** Swiss Caps  
**Address City IN Zip:** 2300 Highway 250, Patriot, Indiana 47038  
**Part 70 No.:** T155-10975  
**Plt ID:** 155-00005  
**Reviewer:** Peter E. Fountaine  
**Date:** May 17, 1999

**CFA Unified Emission Factor Determination for Styrene:** Resin, Mechanical Atomized with 33% Styrene = 111 pounds per ton of resin  
Gelcoat Application with 35% Styrene = 336 pounds per ton of gelcoat

**Resin and Gelcoat**

| Material  | Density<br>(lb/gal) | Weight %<br>Monomer<br>Styrene | Gallons per<br>unit | Units per hour | Pounds Styrene<br>per hour | Pounds Styrene<br>per day | Tons of Styrene<br>per Year | PM tons<br>per year | CFA Unified<br>Emission Factor<br>(lbs/ton) | Transfer<br>Efficiency |
|---|---------------------|--------------------------------|---------------------|----------------|----------------------------|---------------------------|-----------------------------|---------------------|---|------------------------|
| Polyester Resin (EU01 and EU02)(c1988)<br>MR 12302 C ACC GP             | 10.8                | 33.0%                          | 1.90                | 8.00           | 9.14                       | 219                       | 40.0                        | 121                 | <b>111</b>                                  | 75.0%                  |
| Gelcoat (EU03)(c1988)<br>Dark grey sandable 132-72400                   | 9.58                | 35.0%                          | 1.60                | 8.00           | 20.6                       | 494                       | 90.2                        | 87.3                | <b>336</b>                                  | 75.0%                  |
| Clean-up solvent: Resin Blend Mold Stripper, usage: 1.0 gallon per year |                     |                                |                     |                |                            |                           |                             |                     |   |                        |
| Total:  |                     |                                |                     | <b>8.00</b>    | <b>29.7</b>                | <b>714</b>                | <b>130</b>                  | <b>208</b>          |   |                        |
| Styrene Control:  |                     |                                |                     | 0.00%          |                            |                           |                             |                     |   |                        |
| PM Control:   |                     |                                |                     | 98.66%         |                            |                           |                             |                     |   |                        |
| <b>Potential Before Controls:</b>                                       |                     |                                |                     |                |                            |                           | <b>130</b>                  | <b>208</b>          |   |                        |
| <b>Potential After Controls:</b>  |                     |                                |                     |                |                            |                           | <b>130</b>                  | <b>2.79</b>         |   |                        |

**Surface Coating**

| Material                        | Density<br>(lbs/gal) | Gallons of<br>Material<br>(gal/unit) | Maximum<br>(unit/hour) | Weight %<br>Xylene | Weight %<br>Ethyl Benzene | Weight %<br>MIBK | Weight %<br>Glycol Ethers | Xylene Emissions<br>(tons/yr) | Ethyl Benzene<br>Emissions<br>(tons/yr) | MIBK<br>Emissions<br>(tons/yr) | Glycol<br>Ethers<br>Emissions<br>(tons/yr) |
|---------------------------------|----------------------|--------------------------------------|------------------------|--------------------|---------------------------|------------------|---------------------------|-------------------------------|---|--------------------------------|--|
| EU05 BC Color                   | 9.47                 | 0.0500                               | 12.0                   | 13.00%             | 5.50%                     | 27.50%           | 1.50%                     | 3.24                          | 1.37                                    | 6.84                           | 0.373                                      |
| UR50 Reducer                    | 7.28                 | 0.0400                               | 12.0                   | 0.00%              | 0.00%                     | 0.00%            | 3.00%                     | 0.00                          | 0.00                                    | 0.00                           | 0.459                                      |
| EU07 Clear                      | 8.15                 | 0.0540                               | 12.0                   | 25.00%             | 5.50%                     | 0.00%            | 0.00%                     | 5.78                          | 1.27                                    | 0.00                           | 0.00                                       |
| UR50 Reducer                    | 7.28                 | 0.0180                               | 12.0                   | 0.00%              | 0.00%                     | 0.00%            | 3.00%                     | 0.00                          | 0.00                                    | 0.00                           | 0.207                                      |
| <b>Total Potential to Emit:</b> |                      |                                      |                        |                    |                           |                  |                           | <b>9.02</b>                   | <b>2.64</b>                             | <b>6.84</b>                    | <b>1.04</b>                                |

**Total State Potential HAPs Emissions**

|                          | Styrene<br>(tons/yr) | Xylene<br>(tons/yr) | Ethyl Benzene<br>(tons/yr) | MIBK<br>(tons/yr) | Glycol Ethers<br>(tons/yr) |
|--------------------------|----------------------|---------------------|----------------------------|-------------------|----------------------------|
| EU01and EU02             | 40.0                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| EU03                     | 90.2                 | 0.00                | 0.00                       | 0.00              | 0.00                       |
| EU05 and EU06            | 0.00                 | 3.24                | 1.37                       | 6.85              | 0.830                      |
| EU07 and EU08            | 0.00                 | 5.78                | 1.27                       | 0.00              | 0.210                      |
| EU11                     | 0.200                | 0.00                | 0.00                       | 0.00              | 0.000                      |
| Total Potential to Emit: | <b>130</b>           | <b>9.02</b>         | <b>2.64</b>                | <b>6.85</b>       | <b>1.04</b>                |

**Total Combined HAPs Potential:** 150 (tons/yr)

**Methodology:**

Pursuant to 326 IAC 8-1-6 General Reduction Requirements for New Facilities, the limited VOC (Styrene) emissions from the resin and gelcoat operations are greater than the potential VOC (Styrene) emissions  
HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs  
Potential Styrene Pounds per Hour =Density (lb/gal)\* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Emission factor  
Potential Styrene Pounds per Day =Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day) \* Emission factor  
Potential Styrene Tons per Year = Density (lb/gal)\* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs) \* Emission factor  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1 - Weight % Volatiles) \* (1 - Transfer efficiency) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
Total = Sum of all worst case coatings and solvents used

**Appendix A: Emission Calculations**  
**HAP Emission Calculations Limited by 326 IAC 8-1-6**

**Company Name:** Swiss Caps  
**Address City IN Zip:** 2300 Highway 250, Patriot, Indiana 47038  
**Part 70 No.:** T155-10975  
**Plt ID:** 155-00005  
**Reviewer:** Peter E. Fountaine  
**Date:** May 17, 1999

**CFA Unified Emission Factor Determination for Styrene:** Resin, Mechanical Atomized with 35% Styrene = 140 pounds per ton of resin  
Gelcoat Application with 37% Styrene = 377 pounds per ton of gelcoat

**Resin and Gelcoat Limited by 326 IAC 8-1-6**

| Material  | Density<br>(lb/gal) | Weight %<br>Monomer<br>Styrene | Gallons per<br>unit | Units per hour | Pounds Styrene<br>per hour | Pounds Styrene<br>per day | Tons of Styrene<br>per Year | PM tons<br>per year | CFA Unified<br>Emission Factor<br>(lbs/ton) | Transfer<br>Efficiency |
|---|---------------------|--------------------------------|---------------------|----------------|----------------------------|---------------------------|-----------------------------|---------------------|---|------------------------|
| Polyester Resin (EU01 and EU02)(c1988)<br>MR 12302 C ACC GP             | 10.8                | 35.0%                          | 1.90                | 8.00           | 11.5                       | 277                       | 50.5                        | 117                 | <b>140</b>                                  | 75.0%                  |
| Gelcoat (EU03)(c1988)<br>Dark grey sandable 132-72400                   | 9.58                | 37.0%                          | 1.60                | 8.00           | 23.1                       | 555                       | 101                         | 84.6                | <b>377</b>                                  | 75.0%                  |
| Clean-up solvent: Resin Blend Mold Stripper, usage: 1.0 gallon per year |                     |                                |                     |                |                            |                           |                             |                     |   |                        |
| Total:  |                     |                                |                     | <b>8.00</b>    | <b>34.6</b>                | <b>831</b>                | <b>152</b>                  | <b>202</b>          |   |                        |
| Styrene Control:  |                     |                                |                     | 0.00%          |                            |                           |                             |                     |   |                        |
| PM Control:   |                     |                                |                     | 98.66%         |                            |                           |                             |                     |   |                        |
| <b>Potential Before Controls:</b>                                       |                     |                                |                     |                |                            |                           | <b>152</b>                  | <b>202</b>          |   |                        |
| <b>Potential After Controls:</b>  |                     |                                |                     |                |                            |                           | <b>152</b>                  | <b>2.70</b>         |   |                        |

**Methodology:**

Pursuant to 326 IAC 8-1-6 General Reduction Requirements for New Facilities, the limited VOC (Styrene) emissions from the resin and gelcoat operations are greater than the potential VOC (Styrene) emissions  
HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs  
Potential Styrene Pounds per Hour =Density (lb/gal)\* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Emission factor  
Potential Styrene Pounds per Day =Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day) \* Emission factor  
Potential Styrene Tons per Year = Density (lb/gal)\* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs) \* Emission factor  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1 - Weight % Volatiles) \* (1 - Transfer efficiency) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
Total = Sum of all worst case coatings and solvents used

**Appendix A: Emission Calculations  
LPG-Propane - Industrial Boilers**

Page 4 of 6 TSD App A

**Company Name:** Swiss Caps  
**Address City IN Zip:** 2300 Highway 250, Patriot, Indiana 47038  
**Part 70 No.:** T155-10975  
**Pit ID:** 155-00005  
**Reviewer:** Peter E. Fountaine  
**Date:** May 17, 1999

EU05 - one (1) 1.9 MMBtu/hr propane-fired air makeup heater

|   |  |             |  |             |            |           |
|---|--|-------------|--|-------------|------------|-----------|
| EU05 Heat Input Capacity<br>1.90 MMBtu/hr | Potential Throughput<br>177 kgals/year |             | SO2 Emission factor = 0.10 x S<br>S = Weight % Sulfur = 0.00 |             |            |           |
| Emission Factor in lb/kgal                | Pollutant                              |             |  |             |            |           |
|   | PM<br>0.4                              | PM10<br>0.4 | SO2<br>0.0<br>(0.10S)  | NOx<br>14.0 | VOC<br>0.5 | CO<br>1.9 |
| Potential Emission in tons/yr             | 0.0354                                 | 0.0354      | 0.0  | 1.24        | 0.0443     | 0.168     |

EU07 - one (1) 1.5 MMBtu/hr propane-fired air makeup heater

|   |  |             |  |             |            |           |
|---|--|-------------|--|-------------|------------|-----------|
| EU07 Heat Input Capacity<br>1.50 MMBtu/hr | Potential Throughput<br>140 kgals/year |             | SO2 Emission factor = 0.10 x S<br>S = Weight % Sulfur = 0.00 |             |            |           |
| Emission Factor in lb/kgal                | Pollutant                              |             |  |             |            |           |
|   | PM<br>0.4                              | PM10<br>0.4 | SO2<br>0.0<br>(0.10S)  | NOx<br>14.0 | VOC<br>0.5 | CO<br>1.9 |
| Potential Emission in tons/yr             | 0.0280                                 | 0.0280      | 0.0  | 0.979       | 0.0349     | 0.133     |

EU08 - two (2) 1.5 MMBtu/hr propane-fired air makeup heaters

|                                  |           |                             |                       |  |            |           |
|----------------------------------|-----------|-----------------------------|-----------------------|--|------------|-----------|
| EU08 Heat Input Capacity<br>3.00 | MMBtu/hr  | Potential Throughput<br>280 | kgals/year            | SO2 Emission factor = 0.10 x S<br>S = Weight % Sulfur = 0.00 |            |           |
| Emission Factor in lb/kgal       | Pollutant |                             |                       |  |            |           |
|                                  | PM<br>0.4 | PM10<br>0.4                 | SO2<br>0.0<br>(0.10S) | NOx<br>14.0  | VOC<br>0.5 | CO<br>1.9 |
| Potential Emission in tons/yr    | 0.0559    | 0.0559                      | 0.0                   | 1.96   | 0.0699     | 0.266     |

**Total Potential Emissions from Propane combustion**

EU05 - one (1) 1.9 MMBtu/hr propane-fired air makeup heater

EU07 - one (1) 1.5 MMBtu/hr propane-fired air makeup heater

EU08 - two (2) 1.5 MMBtu/hr propane-fired air makeup heaters

|  |  |  |                       |             |            |           |
|--|--|--|-----------------------|-------------|------------|-----------|
| Total Heat Input Capacity<br>6.40 MMBtu/hr | Potential Throughput<br>596 kgals/year | SO2 Emission factor = 0.10 x S<br>S = Weight % Sulfur = 0.00 |                       |             |            |           |
| Emission Factor in lb/kgal                 | Pollutant                              |  |                       |             |            |           |
|  | PM<br>0.4                              | PM10<br>0.4  | SO2<br>0.0<br>(0.10S) | NOx<br>14.0 | VOC<br>0.5 | CO<br>1.9 |
| Potential Emission in tons/yr              | 0.119                                  | 0.119  | 0.0                   | 4.17        | 0.149      | 0.567     |

**Methodology:**

1 gallon of LPG has a heating value of 94,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MMBtu

Emission Factors are from AP42, Fifth Edition (January 1995), Table 1.5-1 (SCC #1-03-010-02)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

**Appendix A: Emission Calculations  
Baghouse Operations**

**Company Name: Swiss Caps  
Address City IN Zip: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 No.: T155-10975  
Plt ID: 155-00005  
Reviewer: Peter E. Fountaine  
Date: May 17, 1999**

| Unit ID | Control Efficiency (%) | Gas or Air Flow Rate (acfm.) | Emission Rate before Controls (lb/hr) | Emission Rate before Controls (tons/yr) | Emission Rate after Controls (lb/hr) | Emission Rate after Controls (tons/yr) |
|---------|------------------------|------------------------------|---------------------------------------|---|--------------------------------------|--|
| EU04    | 99.8%                  | 4400.0                       | 940                                   | 4117                                    | 1.88                                 | 8.23                                   |

**Allowable Rate of Emissions**

| Process Rate (lbs/hr) | Process Weight Rate (tons/hr) | Allowable Emissions (lbs/hr) | Allowable Emissions (tons/yr) |
|-----------------------|-------------------------------|------------------------------|-------------------------------|
| 625                   | 0.313                         | 1.88                         | 8.24                          |

**Methodology:**

Process weight rate = 125 pounds per cap x 5.0 caps per hour = 625 pounds per hour

Control efficiency of 99.8% from applicant supplied Form CE-01

Flow rate of 4,400 acfm from applicant supplied Form CE-01

Emission Rate in lbs/hr (after controls) = Allowable emissions

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = (Allowable emissions (lbs/hr))/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Emissions = 4.10(Process Weight Rate)<sup>0.67</sup>

## Appendix A: Federal Potential Emissions Calculations

VOC and Particulate  
From Surface Coating Operations

Company Name: Swiss Caps  
Address City IN Zip: 2300 Highway 250, Patriot, Indiana 47038  
Part 70 No.: T155-10975  
Pit ID: 155-00005  
Reviewer: Peter E. Fountaine  
Date: May 17, 1999

| Material                                       | Density<br>(lb/gal) | Weight %<br>Volatile<br>(H2O &<br>Organics) | Weight %<br>Water | Weight %<br>Organics | Volume %<br>Water | Volume %<br>Non-Vol<br>(solids) | Gal of<br>Material<br>(gal/unit) | Maximum<br>(unit/hour) | Flash-off<br>(fraction) | Pounds VOC<br>per gallon<br>of coating<br>less water | Pounds VOC<br>per gallon<br>of coating | Potential<br>VOC<br>(lbs/hr) | Potential<br>VOC<br>(lbs/day) | Potential<br>VOC<br>(tons/yr) | Particulate<br>Potential<br>(tons/yr) | VOC<br>solids<br>(lbs/gal) | Transfer<br>Efficiency | Material<br>Substrate |
|--|---------------------|---|-------------------|----------------------|-------------------|---------------------------------|----------------------------------|------------------------|-------------------------|--|--|------------------------------|-------------------------------|-------------------------------|---------------------------------------|----------------------------|------------------------|-----------------------|
| <b>EU05 and EU06, c1990</b>                    |                     |   |                   |                      |                   |                                 |                                  |                        |                         |  |  |                              |                               |                               |                                       |                            |                        |                       |
| <b>Calculated w/ applicant supplied values</b> |                     |   |                   |                      |                   |                                 |                                  |                        |                         |  |  |                              |                               |                               |                                       |                            |                        |                       |
| EU05 BC Color                                  | 8.46                | 69.5%                                       | 0.00%             | 69.5%                | 0.0%              | 21.0%                           | n/a                              | n/a                    | n/a                     | n/a  | n/a                                    | n/a                          | n/a                           | n/a                           | n/a                                   | n/a                        | 75%                    | RFP                   |
| EU05 UR50 Reducer                              | 7.28                | 100.0%                                      | 0.00%             | 100.0%               | 0.0%              | 0.0%                            | n/a                              | n/a                    | n/a                     | n/a  | n/a                                    | n/a                          | n/a                           | n/a                           | n/a                                   | n/a                        | 75%                    | RFP                   |
| DH46 Hardener                                  | 8.54                | 29.0%                                       | 0.00%             | 29.0%                | 0.0%              | 63.0%                           | n/a                              | n/a                    | n/a                     | n/a  | n/a                                    | n/a                          | n/a                           | n/a                           | n/a                                   | n/a                        | 75%                    | RFP                   |
| <b>R-T-S</b>                                   | 7.96                | 78.0%                                       | 0.00%             | 78.0%                | 0.00%             | 13.0%                           | 0.090                            | 12.0                   | 1.00                    | 6.21   | 6.21                                   | 6.71                         | 161                           | 29.4                          | 2.07                                  | 47.8                       | 75%                    | RFP                   |
| <b>EU07 and EU08, c1999</b>                    |                     |   |                   |                      |                   |                                 |                                  |                        |                         |  |  |                              |                               |                               |                                       |                            |                        |                       |
| <b>Calculated w/ applicant supplied values</b> |                     |   |                   |                      |                   |                                 |                                  |                        |                         |  |  |                              |                               |                               |                                       |                            |                        |                       |
| EU07 Clearcoat                                 | 8.15                | 51.0%                                       | 0.00%             | 51.0%                | 0.00%             | 42.0%                           | n/a                              | n/a                    | n/a                     | n/a  | n/a                                    | n/a                          | n/a                           | n/a                           | n/a                                   | n/a                        | 75%                    | RFP                   |
| EU07 UR50 Reducer                              | 7.28                | 100.0%                                      | 0.00%             | 100.0%               | 0.00%             | 0.0%                            | n/a                              | n/a                    | n/a                     | n/a  | n/a                                    | n/a                          | n/a                           | n/a                           | n/a                                   | n/a                        | 75%                    | RFP                   |
| DH46 Hardener                                  | 8.54                | 29.0%                                       | 0.00%             | 29.0%                | 0.00%             | 63.0%                           | n/a                              | n/a                    | n/a                     | n/a  | n/a                                    | n/a                          | n/a                           | n/a                           | n/a                                   | n/a                        | 75%                    | RFP                   |
| <b>R-T-S</b>                                   | 8.05                | 55.0%                                       | 0.00%             | 55.0%                | 0.00%             | 37.8%                           | 0.090                            | 12.0                   | 1.00                    | 4.43   | 4.43                                   | 4.78                         | 115                           | 20.9                          | 4.28                                  | 11.7                       | 75%                    | RFP                   |

State Potential Emissions

Add worst case coating to all solvents

TOTALS:

11.5

276

50.3

6.35

|                       |        |      |     |                  |                 |
|-----------------------|--------|------|-----|------------------|-----------------|
| PM Control Efficiency | 98.66% |      |     | VOC<br>(tons/yr) | PM<br>(tons/yr) |
| Uncontrolled          |        | 11.5 | 276 | 50.3             | 6.35            |
| Controlled            |        | 11.5 | 276 | 50.3             | 0.0852          |

## Methodology:

RTS = Ready to Spray = "as applied"

RTS Density (lbs/gal) = ((Da\*Va)+(Db\*Vb))/(Va+Vb)

RTS Weight % H2O + Organics = ((Wa\*Da\*Va)+(Wb\*Db\*Vb))/((Da\*Va)+(Db\*Vb))

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day) \* Flash-off

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs) \* Flash-off

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Flash-off